

**UNSWORN DECLARATION UNDER PENALTY OF PERJURY  
28 U.S.C. § 1746**

I, Miguel Rivera-Cuadrado, U.S. Postal Inspector with the United States Postal Inspection Service (USPIS), hereby declare as follows:

**PROFESSIONAL BACKGROUND**

I am a Postal Inspector with the United States Postal Inspection Service (USPIS), currently assigned to the Miami Division, San Juan Domicile, located in Guaynabo, Puerto Rico, and have so been employed since September 2019. I also have had additional training and experience with other U.S. Postal Inspectors and federal and local law enforcement agents in connection with the investigation of the use of the U.S. Mail or in connection with the U.S. Postal Service ("USPS"), property of the USPS, and other postal offenses, as set forth in, 18 U.S.C. § 3061. As such, I am an "investigative or law enforcement officer" within the meaning of, 18 U.S.C. § 2510(7). That is, I am an officer of the United States who is empowered by law to conduct investigations and to make arrests for crimes furthered through the use of the U.S. Mail or in connection with the U.S. Postal Service.

I am currently assigned to the San Juan Contraband Interdiction and Investigations (CI2) Team and am primarily responsible for investigations involving the illegal use of the U.S. Mail in the trafficking of narcotics and firearms. As a result, I have conducted numerous firearms and narcotics investigations involving the transportation of firearms and controlled substances; as well as those involving proceeds derived from the distribution of firearms and controlled substances via the mail, in violation of 18 U.S.C. §§ 922 (a) (1) (a) & (a)(3), and 1715, and 21 U.S.C. §§ 841 (a)(1), 843(b), and 846. As a Postal Inspector, I have also worked on several investigations involving the use of the U.S. Mail and the Postal Service to launder and smuggle currency derived from specified unlawful activities, including narcotics

distribution, in violation of 18 U.S.C. §§ 981, 982, 1956, and 1957, and 31 U. S.C. § 5325. Additionally, I have also participated in several interdiction operations targeting parcels containing illegal firearms, narcotics, and proceeds thereof, both in San Juan and elsewhere in the continental United States. While conducting investigations relative to the mailing of firearms, narcotics, and currency, I have had the opportunity to become familiar with known trafficking sources and destination areas, various smuggling methods and techniques used by traffickers, as well as the manner in which traffickers' package illicit firearms, narcotics, and related proceeds.

This Unsworn Declaration is submitted in support of a verified complaint of forfeiture, which involves the offenses detailed in Section 881(a)(6) of 21 U.S.C. particularly all moneys, negotiable instruments, securities or other things of value furnished or intended to be furnished by any person in exchange for controlled substance or listed chemicals, in violation of the subchapter, all proceeds traceable to such an exchange and all moneys, negotiable instruments and securities used or intended to be used to facilitate any violation of, 21 U.S.C.

Because this declaration is submitted for a limited purpose, the undersigned has not included details of every aspect of this investigation. The facts and information contained in this unsworn declaration are based on my personal knowledge as well as observations of other Postal Inspectors involved in this investigation. All observations that were not personally made by me were relayed to me by other law enforcement officers as a result of my personal participation in the investigation of Joseph Pettway (a.k.a. Jose Perez) and others; through information obtained from other law enforcement agencies, witnesses and reliable sources, I am familiar with the facts and circumstances of the offenses described in the "Facts" section of this

unsworn declaration.

Unless otherwise noted, whenever in this unsworn declaration I assert that a statement was made, the information was provided by another law enforcement officer, to whom I have spoken or whose report I have read and reviewed.

Likewise, information resulting from the parcel interdiction and investigation, except where otherwise indicated, does not set forth my observations, but rather has been provided, directly or indirectly, through other law enforcement officers that conducted the interdiction.

**PROPERTY TO BE FORFEITED**

**\$51,800.00 In U.S. Currency**

**INVESTIGATIVE BASIS**

Based on my training and experience I have learned that:

1. The U.S. Mail is often used by narcotic traffickers to transport controlled substances, as well as U.S. currency derived from, or involved in, the distribution of controlled substances, either as payment or proceeds.
2. The drug traffickers know that both Priority Mail Express, and Priority Mail, are considered First Class Mail and are therefore protected against inspection without a Federal Search Warrant.
3. That drug traffickers discern that by using Priority Mail Express and Priority Mail with Delivery Confirmation, they can track the parcels, control dispatch times and locations, and most importantly, have a guarantee of delivery in one or two business days. Moreover, traffickers also know that any delay in a Priority Mail Express parcel delivery could represent that such parcel has been intercepted by law enforcement.

4. That law enforcement agencies have established, based upon years of experience in narcotics investigations, that the state of Connecticut frequently receives controlled substances sent via the U.S. Mail from Puerto Rico. Furthermore, Puerto Rico is a known destination for the returning proceeds or payments of such narcotics from Connecticut.
5. That, in addition to the aforementioned, it is customary for narcotics traffickers to hand write the labels attached to the mail piece instead of using a pre-printed label. Pre-printed labels are customary with most legitimate businesses utilizing the Priority Mail Express service.
6. That individuals who regularly handle controlled substances often leave the scent of controlled substances on the box, packaging materials, and U.S. currency they handle, and that packaging materials are often stored in close proximity to the controlled substances, transferring the odor to the packaging materials.
7. That narcotic canine, also known as K-9, are trained to alert to the smell of various chemicals present in illegal narcotic drugs, such as methyl benzoate, a chemical present in cocaine.
8. That USPIS Inspectors know from training and experience that individuals who traffic in controlled substances rarely include any type of instruction with the proceeds, unlike legitimate businesses or gifts whose note, letter, receipt, or coupon is included with the cash or monetary instruments.
9. Postal Inspectors have found, in most cases, narcotics payments have been primarily in twenty-dollar denominations.

## FACTS

10. On October 4, 2022, at the USPS Mail Processing Annex located in Carolina, Puerto Rico, Priority Mail Express parcel EI523463535US addressed to "Ashley Rojas, HC 05 Box 7143, Guaynabo, PR 00971-9583", with a return address of "Jose Perez, 9 Cottage Place, Bridgeport, CT 06604", was identified by Postal Inspectors as meeting the initial suspicious characteristics of a narcotics mailing.
11. The subject parcel was a USPS Priority Mail Express parcel, had a handwritten label, weighed approximately six (6) pounds and two (2) ounces, and measured approximately 12" x 3.5" x 14". The parcel had affixed to it a U.S. Postage Meter, R2305H130935-13, with a postage amount of \$91.655, the meter was from zip code 06880 dated October 3, 2022.
12. On October 4, 2022, at the U.S. Postal Inspection Service facility, located in Guaynabo, Puerto Rico, the parcel was placed for exterior examination by a narcotics detection canine from the Puerto Rico Police Department. According to the officer who handled the canine, "Tyron", exhibited a change of behavior consistent with the presence of various odors of controlled substances.
13. On October 13, 2022, Federal Search Warrant 22-1254 (M), dated October 12, 2022, was executed on Priority Mail Express parcel EI523463535US. The parcel, a Priority Mail Express white box, marked with the following message "Congrats Baby Pedro, Love Tio" was opened and found inside was a Pampers 'swaddlers' package, a baby toy stuffed animal, three (3) packs of Pampers Wipes and a birthday card. Inside the

Pampers 'swaddlers' package, and inside the three (3) packs of Pampers Wipes, bundles of U.S. Currency were found in different denominations totaling \$51,800.00.

14. On October 14, 2022, the return name and address written on the label of the subject parcel were searched in a law enforcement database, which maintains names, Social Security numbers and the last known addresses and Zip Code information. According to the search results, the return address of 9 Cottage Place Bridgeport, CT 06604, does appear in the database. The sender's name Jose Perez was not found associated with the aforementioned address. On October 17, 2022, per postal management from USPS Bridgeport Post Office, the address 9 Cottage Place Bridgeport, CT 06604 is a valid address. However, the Pettway family was identified as the mail recipients at this address.
15. On October 14, 2022, the delivery name and address written on the label of the subject parcel were searched in a law enforcement database. According to the search results, Ashely Rojas does not appear associated with the delivery address. The name of Emyvette Rojas appeared associated with this address. On October 26, 2022, the Guaynabo Post Office was contacted and according to postal management, HC-05 Box 7143 Guaynabo, PR 00971-9583 is recognized by the U.S. Postal Service as a deliverable address. However, Ashely Rojas is not a mail recipient.
16. On November 7, 2022, Probable Cause Verification was approved by the U.S. Postal Inspection Service Legal Counsel.
17. Notices were sent to all interested parties on November 21, 2022. On November 28, 2022, internet advertisement information was posted in the forfeiture.gov website for 30

consecutive days.

18. On December 3, 2022, a valid Claim for \$51,800.00 in U.S. currency, was received from Joseph Pettway, 9 Cottage Place, Bridgeport, CT 06604.
19. On his claim documents, it is stated that “I have a valid, good faith, and legally recognizable interest in the selected asset because that is my hard-earned savings. I been saving money ever since I got my first job when I was 16 years old, so I worked hard for my money. I have never been in trouble with the law or have done any crime. My money is all accounted for and is all legit. I am an entrepreneur and have my own business which I am the sole proprietor. All profits from my business gets saved. What I love to do with my savings is to broaden my horizons to increase my business and have more passive income. I was in the process of putting a down payment for a house in San Juan Puerto Rico so I can Air BNB it out because San Juan/Carolina is a huge tourist area. That is what I do, I purchase properties and sometimes resell for a profit, or I keep it so I can have a constant money flow”. In addition to the statement, the following documents were enclosed: a “Closing Disclosure form” (6 pages) and a letter “Secretary of State of Connecticut, Certificate of Organization” (2 pages).
20. On December 7, 2022, certified letter was sent to Joseph Pettway, 9 Cottage Place, Bridgeport, CT 06604. It was requested to submit the information no later than 10 days after receipt of the letter. The information requested was:
  1. Provide copy of your bank statements, for the last year, which indicates the withdrawal and/or deposits of the seized amount, or evidence of the origination of the cash.

2. Provide proof of employment and / or evidence of income. Please, include a name and contact phone number of your manager/supervisor.
  3. Copy of the latest tax filling statements (State and Federal) and a copy of a valid government identification.
  4. Explain the reason why cash was sent via mail instead of a financial instrument such as a personal check, business check, manager's check, or money orders.
  5. Provide a statement explaining your relationship with Jose Perez and Ashley Rojas. For each person, please include a valid address and contact phone number.
  6. Provide the address and a description of the property in Puerto Rico, for which the money was intended for. Please include the name of the owner of the property and a contact number.
  7. Provide a description of the box used for the mailing and all the contents; explain the concealment method used. In addition, please state the name of the Post Office where the item was mailed and method of payment with a copy of the transaction receipt. On October 14, 2022, certified mail 70141200000218620332 was delivered to Gerace & Associates, 21 Oak Street, Hartford, CT 06106.
21. On December 14, 2022, three (3) emails from Joseph Pettway <josephpettway439@gmail.com> were received, with the following information: "I am currently employed at the USPS. My supervisor's name is Del Moore and the best contact number is 203-326-2120. I am giving bank statements anyway even though I have receipts from my tenants that pay me each month faithfully. And they all pay cash.



My PPP Loan money was saved, and I did not open up that Chicken Business again because covid ruined my business". The emails included the following documents:

- A. Letter from Joseph Pettway (not signed) titled "My Letter 1" and page two "My Letter 2".
- B. Copy of the USPS receipt from Westport Post Office for \$91.65.
- C. Six (6) pictures from properties in Puerto Rico.
- D. Two (2) pages with copies of receipts from "tenants".
- E. USPS Employee Earning Statement pay period 25-2022.
- F. Letter from Small Business Administration: Notice of Paycheck Protection program Forgiveness payment.
- G. Copy of the PPP loan Note.
- H. W2 Forms from Social Finance, Inc. for Joseph Pettway.
- I. 1040 Tax forms for 2020 and 2021
- J. SOFI bank statements for account number ending 7431 and 4987 the following months: June 2022, July 2022, September 2022, October 2022, and November 2022.
- K. GO Bank statements for account #695985361931 for the following periods:  
11/20/2022 thru 12/19/2020; 12/20/2020 thru 01/19/2021; 1/20/2021 thru 2/19/2021; 2/20/2021 thru 3/19/2021; 3/20/2021 thru 4/19/2021; 6/20/2021 thru 7/19/2021; 8/20/2021 thru 9/19/2021; 10/20/2021 thru 11/19/2021; 11/20/2021 thru 12/19/2021; 1/20/2022 thru 2/19/2022, and 04/20/2022 thru 05/19/2022.

22. An analysis of the bank statements from GO Bank, account #695985361931, for the period between March 20, 2021, and July 19, 2021, revealed movement of amounts of money where account balance increased from \$8,413.24 to \$59,496.79. However, the statement for the period covering between April 20 and May 19, 2022, were not included.
23. Based on the documentation submitted by Joseph Pettway, on April 28, 2021, Joseph Pettway was granted a PPP Loan from Harvest Small Business Finance, LLC for the amount of \$20,833.00. Joseph Pettway is a US Postal Service (USPS) employee since September 2020 and apparently owned a business named "Chicken Guru". The loan amount was deposited at the Discover Bank (Discover) in a cashback debit account #7029926577.
24. Joseph Pettway admitted on his statement that he used the name of Jose Perez in the mailing label since made more sense for him to choose a Spanish name similar to his. Jose Perez's name was not associated initially with the return address on the mailing label. Ashley Rojas, the parcel addressee, has not been located since her name does not appear associated with the mailing address.
25. Tax forms provided by claimant Joseph Pettway does not provide any other information related to his alleged business other than his salary from the USPS.
26. Since Joseph Pettway is a postal employee, he should know the process related to sending cash by mail and the process to purchase postal money orders on transactions over \$3,000.00. All transactions over \$3,000.00 are required by law to fill out the purchaser information and identifiers. Joseph Pettway stated, "it would not be cost


effective to purchase 52 of them”, referring to the question of why the seized money was not sent using other financial instruments.

27. Additional search revealed that on October 5, 2022, a service request (customer complaint) was processed by USPS customer service department. Service request number #43265551 was created after Joseph Pettway called to inquire about his package, EI523463535US. As per Joseph Pettway the dollar value of the item mailed was \$1,000.00 and contents included cash/coin and clothing. On October 7, 2022, a second service request (customer complaint) was processed by USPS customer service department. Service request number #43343483 was created after Joseph Pettway called to inquire about his package, EI523463535US. As per Joseph Pettway the dollar value of the item mailed was \$1,000.00 and contents included cash/coin and clothing.
28. Statement and documentation provided by Joseph Pettway does not provide specific details as to the legitimacy of the \$51,800.00.
29. Based on the facts (1) of the suspicious manner in which the defendant money was transferred, not wired, not sent by check, but rather sent in cash, uninsured, overnight by Priority Mail Express shipment which was paid for in cash; (2) of the amount of cash involved, \$51,800.00; (3) the method of concealment found inside the parcel; (4) a trained narcotics canine alerted positive on the package; (5) no documents or evidence of the legitimacy of the seized U.S. Currency have been submitted, (6) the information provided by customer Joseph Pettway to the USPS customer service stating that the content value of the parcel was \$1,000.00 and never made a formal request to the USPS about the amount of money missing; (7) the use of different names in the mailing label;

(8) the possibility of loan fraud and irregular transactions not justified on his accounts, including his association with individuals with extensive criminal record related to narcotics; the undersigned believes that the \$51,800.00 in US Currency seized from Jose Perez / Joseph Pettway constitutes proceeds derived from the illegal sale of narcotics in violation of, 21 U.S.C. §§ 841 (a)(1), 843(b), and 846, and property involved, that is, \$51,800.00 in United States currency is subject of forfeiture pursuant to 21 U.S.C. § 881(a)(6) and 18 U.S.C. 981(a)(1)(A).

30. I declare under penalty of perjury that the above is true and correct to the best of my knowledge and belief, pursuant to 28 U.S.C. § 1746.

In San Juan, Puerto Rico, this 28 day of February 2023.



Miguel A. Rivera-Cuadrado, US Postal Inspector  
United States Postal Inspection Service  
San Juan, Puerto Rico